

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

SILAS CALHOUN and EMILY CALHOUN,
Individually and as Parents and Next Friends
of ESTELLA CALHOUN,

Plaintiff,

v.

UNITED STATES OF AMERICA

Defendant.

Civil Action No. 04-10480-RGS

**JOINT MOTION FOR ENLARGEMENT OF TIME
TO FILE PROPOSED FINDINGS OF FACT AND LAW**

The parties, by and through their attorneys, hereby move this Court for an enlargement of time to file proposed findings of fact and law in the above captioned action. Good cause exists for this motion. Due to a backlog of work the court reporter has been unable to complete the trial transcripts. As of the date of this motion, only the first day of trial has been completed and transmitted to the parties. The next 4 days of transcripts are expected to be transmitted by July 20. Thus, the parties were unable to complete their respective proposed findings of fact and law by the Court's previously approved deadline of July 3, 2007. Accordingly, the parties request an enlargement of time until August 2, 2007, to file proposed findings of fact and law.

This Motion is made in good faith and is not made to delay the action, or for any other improper purpose.

For the Plaintiffs,

Silas and Emily Calhoun,
Estella Calhoun,

/s/Michael S. Appel

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For the Defendant,

UNITED STATES OF AMERICA

MICHAEL J. SULLIVAN
United States Attorney

By: /s/ Anton P. Giedt 7/18/2007

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Suffolk, ss.

CERTIFICATE OF SERVICE

Boston, Massachusetts
DATE: July 18, 2007

I, Anton P. Giedt, Assistant U.S. Attorney, do hereby certify that I have this day served a copy of the foregoing upon the Plaintiffs' counsel of record by Electronic Filing.

/s/ Anton P. Giedt
Anton P. Giedt
Assistant U.S. Attorney

PLAINTIFFS' COUNSEL:

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